

From: [ANDERSON Jim M](#)
To: [Kristine Koch/R10/USEPA/US@EPA](#); [Eric Blischke/R10/USEPA/US@EPA](#); [Chip Humphrey/R10/USEPA/US@EPA](#); [Sean Sheldrake/R10/USEPA/US@EPA](#); [Deb Yamamoto/R10/USEPA/US@EPA](#)
Cc: [JOHNSON Keith](#); [MCCLINCY Matt](#)
Subject: 6/19/07 DEQ/EPA SC Mtg
Date: 06/22/2007 11:17 AM
Attachments: [DEQ EPA SC Mtg Agenda 6_19_07.doc](#)

Thanks, everybody, for attending & making our 6/19 meeting successful.

I said I'd prepare a short summary of the mtg & identify Action Items & Open Issues.

Mtg Summary

We pretty much covered all the agenda items on the mtg agenda attached below.

<<DEQ_EPA SC Mtg Agenda 6_19_07.doc>>

We started the mtg all agreeing that DEQ & EPA have a shared, common goal for Source Control (SC) ..., to control significant upland sources of contamination that either pose a recontamination threat to in-water remedies or a direct risk threat to in-water receptors by the time of the in-water PH ROD. However, we acknowledged that we have differences in opinion on the breadth, details & implementation schedule for this goal..., & that's 1 of the things we need to resolve.

In my mind, the 2 most important desired outcomes of the 6/19 mtg were:

1) DEQ presenting our position/strategy/schedule for upland SC- We explained that we see SC as a phased effort. DEQ is following the process outlined in the JSCS. We're using the JSCS to prioritize sites & focus our efforts to identify, evaluate & control significant sources of contamination 1st..., & then evaluate then & type of SC for less significant sources later. As described in our SC Milestone Rpts, we are working to have Source Control Measures (SCMs) constructed & effectively operating at all high priority sites by the time of the PH ROD.

We also tried to make 2 important points. 1st, we see JSCS Screening Level Values (SLVs) as screening levels used to help us prioritize sources & focus our efforts. We don't see JSCS SLVs as RAOs or clean-up goals..., although some of the SLVs may end-up being RAOs later. 2nd, DEQ won't be put in the position where we're requiring upland RPs to design & implement SCMs on criteria more stringent than what EPA would require an in-water RP to take on an in-water remedy. In other words, DEQ is unwilling to require upland SCMs on criteria more stringent than what are considered triggers for in-water clean-up work.

2) EPA presenting their expectations for upland SC- Honestly, I didn't feel that we heard as clear of an expectation from EPA as I was hoping for. I did hear from Kristine..., as I've heard from her before..., that EPA expects DEQ to have identified, evaluated & controlled all contaminant migration pathways at all significant upland sources of contamination by the PH ROD. I also heard that..., for non-high priority sites..., EPA expects DEQ to use the JSCS's line-of-evidence/weight-of-evidence approach to determine if SCMs are needed. I also heard that..., until site-specific, in-water, cleanup standards are developed thru the PH RI/FS process..., EPA expects DEQ to use JSCS SLVs as design criteria for SCMs. I do appreciate this clarity.

Action Items

1) DEQ- Work with RPs to have the RPs copy EPA on important upland project documents (e.g., work plans, reports, etc).

2) Jim/Matt/Kristine- continue monthly SC coordination meetings & plug Chip &/or Eric into the mtgs as appropriate.

3) DEQ- Currently there are approximately 30 sites on Table 1 of the Milestone Report that are

not prioritized. The next Milestone Report should clearly convey when these sites will be prioritized.

4) DEQ- Determine whether Gould & PEO should continued to be carried as High Priority sites in future Milestone Reports.

5) DEQ- Consider including Cargill, PGE Station L, & Zidell in Table 1 of future Milestone Reports.

6) EPA- Complete draft 104(e) Information Request letters & mailing list, & allow DEQ to review list & template letter (not every specific letter) before they are sent to the RPs.

7) EPA- Send DEQ draft SC database design in summer '07 for our review.

8) DEQ- DEQ will submit the next Milestone Report in 7/07 rather than 6/07.

Open Issues

1) High Priority Sites- As stated above, EPA's expectations for SC are that DEQ control **all** pathways at all high priority sites by the ROD. DEQ position is that we will control all high priority pathways at the high priority sites by the ROD. This difference needs to be resolved.

2) Develop Management Strategy for Low & Medium Priority SC Sites- Both agencies agreed DEQ & EPA should consider developing a management strategy to complete SC at low & medium priority sites. We should think about whether there's a streamlined process for closing these sites without necessarily involving as much staff time as we have in the past.

3) Expanding SC to Downtown Corridor- EPA recommended DEQ should consider preparing a comprehensive strategy of how the State will evaluate & control upstream SC..., particularly in the Downtown corridor.

4) SC & ROD- DEQ & EPA need to further consider how the PH ROD will deal with SC.

XXXXXXXXXXXXXX

If anyone thinks I mis-represented what occurred at the mtg or that I left anything important out..., please reply or call me.

James M. Anderson
Manager, Portland Harbor Section
DEQ NWR
Phone (503) 229-6825
Cell (971) 563-1434
Fax (503) 229-6899